

North Lanarkshire Council

Report

Transformation and Digitalisation Committee

approval noting

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DigitalNL - Infrastructure

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Executive Summary

Reflecting Programme of Work item P067 – Digital Economy and Place - this report sets out the case for the council to invest in a world-class network infrastructure to provide universal connectivity across North Lanarkshire with a view to driving forward economic growth and tackling areas of digital exclusion. This will provide the supporting infrastructure to enable the effective roll-out of the council's DigitalNL transformation programme, in line with the council's Digital and IT Strategy.

Such significant activity needs to be of benefit to the Council, therefore an outline business case was developed to identify how North Lanarkshire will benefit from the increased connectivity this investment will achieve. With the outcomes of the business case as its basis, the report recommends delivery through a partnership model, at an indicative cost over a 10-year period to the council of £17.7m.

The economic impact assessment for this preferred option is anticipated to result in a gross economic benefit to North Lanarkshire of circa £61.7m over the 10-year period. The partnership model proposed achieved the highest benefit cost ratio in the assessment, even upon sensitivity testing with results estimated for every £1 spent by the council, there would be £3.70 of benefits delivered to North Lanarkshire as a whole by increasing output, increasing access to employment opportunities, and improving health and social mobility, plus a series of other positive outcomes.

The report seeks approval to commence formal market engagement under a partnership model to secure a network connectivity partner who will invest jointly through a competitive dialogue process to develop a world-class digital infrastructure in North Lanarkshire.

Recommendations

It is recommended that the Transformation and Digitalisation Committee:

- 1) Note the contents of the Report and benefit to North Lanarkshire arising from this investment, and
- 2) Approve the commencement of formal market engagement to engage a connectivity partner through a competitive dialogue process, as outlined in paragraphs 2.30 and 2.31.

The Plan for North Lanarkshire

Priority	Improve economic opportunities and outcomes
Ambition statement	(5) Grow and improve the sustainability and diversity of North Lanarkshire's economy
Priority	Enhance participation, capacity, and empowerment across our communities
Ambition statement	(18) Ensure our digital transformation is responsive to all people's needs and enable access to the services they need
Priority	Improve North Lanarkshire's resource base
Ambition statement	(24) Review and design services around people, communities, and shared resources

1. Background

- 1.1 The council's DigitalNL transformation programme has three key aspirations: to digitise council services, upskill staff and residents, and stimulate economic growth. It has been recognised within the Council's Digital and IT Strategy that the development of a digital economy and place will improve connectivity within North Lanarkshire's communities and support inward investment and economic regeneration. Through digital transformation and responding to technological change, North Lanarkshire can become a SMART region to Live, Learn, Work, Invest and Visit.
- 1.2 The Digital and IT Strategy has identified that digital transformation both internally within the council and externally across North Lanarkshire is central to the council achieving its priorities and ambitions within The Plan for North Lanarkshire. The council requires to effectively embrace, expand and use technology to ensure council services are designed and delivered to support the changing needs of local communities and businesses.
- 1.3 The Strategy also outlines the need to implement a state of the art public Wi-Fi network in key council buildings, facilitate 5G coverage, providing the foundations on which we can transform residential areas into Smart Towns and connect them to innovative services that help reduce demand and support priorities. It further identifies that we require to enable 'the internet of things' as standard across our homes, streets, communities and towns. To achieve this, a world-class digital infrastructure which provides universal and affordable connectivity is required.
- 1.4 An initial piece of work was carried out in late 2018 to produce a Digital Economy and Place Ambition report for North Lanarkshire as part of the Digital NL programme. The Digital Economy and Place Ambition aims to improve connectivity within the council's own estate and our communities in order to support inward investment and economic regeneration through the following three strategic objectives:
- **Smart People, Health and Education** – eliminating areas of low connectivity, increasing access to education, and training. Tackling inequalities and exclusion.
 - **Smart Economy and Digital Jobs** - creating an environment that fosters innovation and makes new digital markets and delivery models possible. Pulling down structural barriers to growth.
 - **Smart Living and Working** – providing the underlying infrastructure to support people living and working in a Smart and Digital way
- 1.5 To achieve the three strategic objectives, four key inter-related projects were identified:
- Project 1 - Delivery of a world class digital infrastructure
 - Project 2 - Digital Business
 - Project 3 - Digital Skills and Inclusion, and
 - Project 4 - (Commercialisation of) Data.

This report focusses on the delivery of Project 1 which, as recognised in Programme of Work item P067 – Digital Economy and Place – approved at Policy and Strategy on 21 March 2019, is critical to the effective delivery of the other projects and the wider roll-out of the DigitalNL transformation programme.

- 1.6 In order to achieve a world class digital infrastructure, it has been recognised that there requires to be large scale improvements to both the council's own digital infrastructure and the wider network which will greatly assist in driving forward economic growth and tackling areas of digital exclusion caused by rural isolation or deprivation.
- 1.7 Whilst improvements to the wider North Lanarkshire digital infrastructure have been undertaken both commercially and through the rollout of the Digital Scotland Superfast Broadband programme, there remain pockets of low connectivity and in some areas there has been a low take-up of available services. In addition to this, the current network infrastructure for the wider North Lanarkshire is not fully connected to the council's own infrastructure which now requires to be upgraded to meet the future digital and connectivity requirements of the council. By combining these two areas into an innovative, integrated solution, the council can enable universal connectivity across North Lanarkshire for its residents, communities and businesses, and simultaneously provide the integrated digital infrastructure backbone required for the council's current and future estate and the deployment of smart towns/homes.
- 1.8 This report outlines and presents the rationale and findings of the outline business case which highlights the significant benefits that investment in a world-class digital infrastructure and the provision of universal connectivity would provide to North Lanarkshire over the next ten years. Reflecting P067 of the Programme of Work, the report also seeks approval to engage with the market to secure a network connectivity partner to jointly invest in the infrastructure and supporting activity required to achieve this.
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2. Report

- 2.1 Following completion of the initial Digital Economy and Place Ambition report, the council has worked with its digital partner, PwC to develop an outline business case to explore options to enable the creation of a world class digital infrastructure. Specifically the outline business case has identified the need to develop a new network infrastructure that will provide universal connectivity across North Lanarkshire to drive economic growth and tackle economic exclusion as well as address the current limitations of and to connect to the council's own digital infrastructure.
- 2.2 The outline business case considered in detail the following areas:
- Strategic Case – setting out the rationale to support the proposed investment, covering vision, outcomes, capability model, service delivery model and options overview.
 - Economic Case – setting out an options appraisal of the proposal covering socio-economic benefits and impacts of the proposed options.
 - Financial Case – setting out the cost model used and associated financial benefits of the proposal
 - Commercial Case – setting out the procurement strategy which would enable the execution of the proposal
 - Management Case – describing the plan, governance and team requirements to implement the proposal.

THE CURRENT COUNCIL INFRASTRUCTURE

- 2.3 The Council has approximately 240 leased line services that form the majority of its Wide Area Network (WAN). This is currently provided by Capita via the SWAN service that was established by the Scottish Government in 2014. However, following approval by the Transformation and Digitalisation Committee on 15 May 2019, the majority of this provision is in the process of being novated to the underlying service provider Virgin Media, on a 2 year contract. A small selection of services will remain with SWAN where it is financially and operationally advantageous. This has the additional benefits of retaining SWAN as a possible DigitalNL Infrastructure provider and retains access to the SWAN Value Add Service catalogue.
- 2.4 These actions are an interim measure whilst the Business Case for the wider DigitalNL infrastructure agenda is understood, considered, approved and procured as appropriate, and ultimately implemented. This interim solution provides a short term operational uplift on service provision predominately to aid the curricula delivery within our educational establishments, but makes no provision for change to the underlying network design.
- 2.5 The existing corporate network design has been in place for some ten years. Although it has undergone change during this period, the underlying fundamental design, (ring and star, dependent upon core council buildings, with centralised common breakout) has remained. During this time both the IT industry and service user requirements have significantly changed, with cloud services, staff mobility, connectivity options and the rise in digital curricula in particular being key drivers for council change. However these changes only reflect service change, the other major factors driving the outline business case are strategy and efficiency.
- 2.6 The strategy behind the previous design was one that accommodated the sole needs of the council at that time. It did not look to influence solutions for the wider connectivity requirements of its residents and local businesses. Similarly its internal focus was siloed and considered only traditional networking requirements. These requirements have changed and grown and will continue to do so as the development and adoption of connected devices, the “Internet of Things” and 5G, become common place.
- 2.7 This new strategy embodies both the ethos of the DigitalNL objectives and aligns with “The Plan for North Lanarkshire”. It looks to build a digital infrastructure that not only meets the changing needs of council services, but also to use its requirement to influence the connectivity infrastructure across the council to the benefit of its residents and local businesses. Further, in doing so, it provides not only a strong connectivity foundation but a structured enabler for future innovation in the delivery of council services, which will aid the adoption of proactive council services built upon enhanced data driven decisions enabling greater efficiency.

THE WIDER NORTH LANARKSHIRE DIGITAL INFRASTRUCTURE

- 2.8 Since 2012, the Scottish Government’s Digital Scotland Superfast Broadband (DSSB) programme has been putting in place the foundations of a superfast broadband infrastructure throughout North Lanarkshire, which the forthcoming “Reaching 100% programme” (R100) will build upon over the next three or more years. This accompanied by commercial roll-out has resulted in 98.1% of premises as at the end of March 2019 in North Lanarkshire having the ability to gain access to superfast broadband (at least 24 Mbps). However, of the 28,303 properties

supported through the DSSB programme, only 56.53% have taken advantage of those services. This is in part due to the lack of affordable connectivity and/or lack of access to devices.

- 2.9 Furthermore, 97.3% of the roll-out in North Lanarkshire has been delivered through "Fibre to the Cabinet" (or variations on FTTC technology), with "Fibre to the Premise" only accounting for 2.7% of deployment. The use of copper cables from the cabinet to properties leads to performance issues for properties that are too far from the cabinet.
- 2.10 Despite the ongoing investment, there remains pockets of digital exclusion for both residents and businesses across North Lanarkshire. In particular, the current infrastructure does not extend fully to rural communities exacerbating issues experienced through rural deprivation and isolation.
- 2.11 Whilst the ongoing roll-out of programmes such as DSSB and R100 will enable more properties should they wish to and can afford to access broadband services, it is not fully connected as outlined above to the council's infrastructure and does not address the issue of universal connectivity.

THE VISION AND KEY OUTCOMES FROM UNIVERSAL CONNECTIVITY ACROSS NORTH LANARKSHIRE

- 2.12 A core element of the outline business case has been identifying some of the key features of the vision for universal connectivity in North Lanarkshire. This vision has the ambition that all North Lanarkshire residents, employees and businesses could access internet connectivity irrespective of their financial context or geographical location.
- 2.13 This vision can be defined across the following three areas:
- **Universal** – availability of a high speed connectivity network across North Lanarkshire. As part of this universal connectivity, the network will also provide an integrated backbone for the future public sector estate (including future community hubs, schools and council buildings) and the deployment of smart towns/homes.
 - **Additional** – Within the universal connectivity, additional access would cater for enhanced connectivity for current and future assets which support initiatives such as Digital Learning) e.g. within community hubs. This will also help businesses to make the most of high speed connectivity and should lead to growth across a wide range of economic sectors within North Lanarkshire.
 - **Intensive** – Intensive access caters for the provision of connectivity to those who most need it. This includes basic connectivity for North Lanarkshire's most deprived communities via the universal offering.
- 2.14 There are a range of key direct and indirect outcomes that are anticipated to be delivered through the proposed investment. These include:
- **Economic growth** – Increased economic output/GVA, increased business start-ups and survivability, increased number of businesses investing in North Lanarkshire, increased earnings of people who both live and work in North Lanarkshire, growth and improved sustainability and diversity of North

Lanarkshire's economy, increased innovation and digital capability within the local business base, improved utilisation and availability of high quality data.

- **Social and healthcare** - Reduced number of children and their families living in poverty, creation of connected, viable and sustainable town centres, improved independence and quality of life of our residents, improved connectivity across North Lanarkshire with a focus on rural areas and areas of high deprivation, provision of the infrastructure to support the delivery of digital health and social care services, including the use of efficient centralised and home based sensors (IoT devices).
- **Skills development and employability** - improved economic outcomes for local people, and in particular those who are most disadvantaged, increased number of residents in employment, improvements to the further education and employment prospects of our young people, and increased skills and qualification levels of the North Lanarkshire workforce.
- **Attracting investment** to North Lanarkshire making it more attractive to live, learn, work, invest and visit.

THE TECHNICAL SOLUTION

- 2.15 Market review and development of the outline business case has established that there is no single technical solution that would meet the current and future needs of universal connectivity. It is understood that layers of complementary connectivity technologies such as 5G, fibre and low power radio wave as well as current technologies such as copper wires, 4G and satellite broadband, will be meshed; creating an ubiquitous connection layer facilitating the right sized communication for a variety of requirements.
- 2.16 The future network infrastructure is critical to provide universal access for North Lanarkshire. Building on this, the infrastructure can be an enabler to realising many more benefits. These include, the delivery of 'Smart' services to homes and businesses across North Lanarkshire including initiatives such as health monitoring devices, smart boilers or smart lighting and other uses which can enrich the lives of residents, identify efficiency savings, support climate initiatives and allow the council to deliver on its overall DigitalNL and other goals.
- 2.17 Layered on top of the core infrastructure will be the ability to deliver the Internet of Things in North Lanarkshire through Internet of Things (IoT) Gateways and devices. These will be enablers for our Smart Towns and key providers of data that will inform decisions about the delivery of Council services.
- 2.18 A phased approach to implementation will be required to prioritise areas of high deprivation, low connectivity and rural exclusion. This must be done minimising the financial impact to the Council whilst recognising the commercial motivations of suppliers. However a balanced view to new infrastructure where it is needed most, whilst maximising the return on investment is achievable, with the right planning and the correct partner.
- 2.19 There is reasonable evidence to suggest that adopting a holistic and joined-up view across the council with regards to connectivity infrastructure, the market can be influenced positively to the benefit of the DigitalNL agenda. Indeed it is foreseeable

that additional revenue streams may be exploitable through the licensed use of council street furniture and buildings.

OPTIONS ANALYSIS

2.20 A range of technical solutions and delivery models have been evaluated. For the choice of technical solution options, there was only one option able to meet requirements – a hybrid model – meaning different types of technologies would need be deployed to deliver universal connectivity. Against this, four commercial options were developed and appraised to identify the model which would deliver the maximum value benefit for the Council. The four commercial models which have been considered are as follows:

- **Do Nothing** – whereby some enhancements would be delivered through external government schemes and market forces but the full vision would not be achieved
- **Partnership Model** – whereby the council would set-up a partnership with a vendor/network partner to jointly deliver the council's vision of universal affordable connectivity with both the vendor and the council investing in the solution.
- **Buy-It Model** – whereby the council would procure the required services from the market to deliver the council's vision of universal affordable connectivity.
- **Build-It Model** – whereby the council would build its own network.

2.21 Each of the commercial models were evaluated against 5 criteria: cost, revenue opportunity, ease of delivery, socio-economic benefits and risk. The result of the options appraisal was that a partnership model was the preferred option.

THE ECONOMIC AND FINANCIAL CASE FOR INVESTMENT

2.22 The Economic Case was also considered within the Outline Business Case to provide an assessment of the wider economic and social benefits. The benefits were compared against the costs of three delivery options being considered (partnership, buy-it, and build-it). These benefits were also compared against a 'do nothing' scenario whereby the council does not invest in the proposed infrastructure programme. This approach is standard industry best practice when assessing the economic case of any public sector investments.

2.23 An input-output model was developed which allowed the core benefits to be quantified. The model considered three channels of impacts:

- Direct benefits from the council's potential investment such as (short-term) jobs created which are directly related to the infrastructure programme (demand-side effects)
- The effects such investment would have on businesses (such as the take up of broadband and adoption of new technologies leading to higher productivity) as well as new businesses setting up or investing in North Lanarkshire (known as supply-side effects).
- Household effects such as increased take-up of broadband in North Lanarkshire's households, giving access to online services (including education and healthcare services) and creating opportunities for people to set up businesses and/or work from home.

- 2.24 Each of these channels will have an overall impact on employment and economic output (Gross Value Added - GVA) across North Lanarkshire as well as impacts on people's wellbeing resulting from so called 'household effects'.
- 2.25 The overall outcome of the economic assessment is summarised in the table below alongside the benefit cost ratio calculated over a ten year return period.

Delivery Model	Estimated Council Spend (Costs)*	Estimated Impacts (Direct Benefits + Wider Benefits)	Benefit Cost Ratio
Partnership Model	£16.5m	£61.7m	3.7
Buy it Model	£37.7m	£75.7m	2.0
Build it Model	£47.9m	£85.9m	1.8

(* Note: The economic model has used a discounted cost to bring future costs in line with today's prices for the purpose of calculating the economic benefit)

- 2.26 The above table shows scope for all delivery models to provide a positive return on the Councils investment. However, the Partnership model delivers best value with around £3.70 of benefits delivered throughout North Lanarkshire for every £1 spent.
- 2.27 Based purely on the economic case, the cost-benefit analysis would recommend pursuing a Partnership delivery model at this stage due to this producing best value of the three proposed delivery models tested.

PROCUREMENT OF THE INFRASTRUCTURE SOLUTION

- 2.28 Given the complexities of the proposal, the procurement will require to be outcome-driven, enabling the knowledge and experience existing within the market to dictate the technical make-up of the solution.
- 2.29 Soft market testing has indicated that the market would be able to support the proposed service delivery model. A number of suppliers have been engaged in outcome-focussed discussions to verify the feasibility of implementation against the wider vision. These discussions have been positive in relation to the ability to deliver against the vision.
- 2.30 The first stage of the procurement process will involve a Prior Information Notice (PIN) being released to the market, containing details of the intended procurement alongside the proposed partnership model. Following formal market engagement through the PIN, the council will be in a position to make an informed decision on whether there is market support for this type of model. Should there be insufficient support, it is recommended that a buy-it model would be considered.
- 2.31 The outline business case also considered options for routes to market for any subsequent procurement process focussing on either a restricted procedure, a competitive dialogue or utilisation of existing frameworks including the current SWAN framework. Based on an evaluation of the potential routes to market, it is recommended that a bespoke competitive dialogue route should be followed. This would enable the council to work with potential network suppliers to turn high level outcomes into an innovative technical solution alongside negotiating contractual and financial terms. It would also ensure that the best of the knowledge of the market is brought to the council to develop the best technical solution to meet current and future requirements.

MANAGEMENT CASE

- 2.32 Given the complexities of the procurement, a draft programme structure has been outlined to consider the management of the procurement process, delivery and roll-out. The programme will require effective reporting and governance and close management of the risks throughout with a focus on achieving the wider outcomes.
- 2.33 A programme board will be required aligned to the current DigitalNL Board. A NLC Programme Manager will also require to be in place to oversee the process supported by a Design Lead, Implementation Lead and Business Change Lead. The high level team would require to work closely with the network connectivity partner as well as services across the council.

CONCLUSION

- 2.34 In implementing the proposals within this paper, the council, residents and businesses within North Lanarkshire will benefit from significantly from improved connectivity and enable North Lanarkshire to drive forward its ambition to be *the* place to live, learn, work, invest and visit. The underlying investment in digital infrastructure will help to drive economic growth and tackle areas of digital inclusion within North Lanarkshire. It will also accelerate the roll-out of 5G within North Lanarkshire which requires a fibre backbone and will enable the adoption of technologies linked to SMART towns and homes, and the Internet of Things.

3. Equality and Diversity

3.1 Fairer Scotland

Under the Fairer Scotland Duty, the future digital infrastructure and requirement for universal connectivity will actively consider how the council can reduce or eliminate inequalities caused by digital exclusion alongside socio economic disadvantage. Providers will be required to address access and affordability to digital services and resources.

3.2 Equality Impact Assessment

None has been undertaken for the purposes of this report. A full Equalities Impact Assessment will be carried out to ensure that the solutions provided have equality of opportunity at their core.

4. Implications

4.1 Financial Impact

A costing model was considered to estimate the indicative costs of each of the proposed options based on a geographic approach and using current market benchmarks for equipment, fibre, civil work and the costs of managed services.

If progressed, funding will be required from either the Council's capital programme or the Community Investment Fund to support the infrastructure and transformation aspects of the programme..

Whilst consideration will be given to potential grant funding opportunities available to the council to support the programme, the estimated cost of this partnership model is

£17,777,455 over a 10-year period. Funding levels, including the estimated recurring revenue cost of the managed service, are detailed below

Deliverables	Estimated Total Cost
Infrastructure – spread over 3 years	£6,944,250
Transformation Costs – spread over 3 years	£1,500,000
Managed Services (recurring revenue) – spread over 10-years	£9,333,205
Total	£17,777,455

It should be noted that the overall cost of the infrastructure requirement across all the models (including the partnership model) is anticipated to be £27,777,000. A major advantage of using a partnership model is the ability to attract infrastructure investment from the partner, which foresees the Council contributing circa. £6,944,240 (25% of the total cost of the required infrastructure), and the remaining 75% being invested through the network connectivity partner.

In relation to the managed services (recurring revenue cost) which equates to circa. £933,321 per annum, the Council currently spends in the region of £950,000 per annum to maintain its current levels of WAN infrastructure.

4.2 HR/Policy/Legislative Impact

The management case has recommended the need for a dedicated team to be in place to work closely alongside the network connectivity partner. This would require a Programme Manager, a Design Lead, an Implementation Lead and a Business Change Lead. The requirements for these posts will be fully considered and posts will be subject to job evaluation. The posts will either be recruited in line with the Council's policies or met from existing resources or through secondments.

Given the complexities of the design of the requirements and delivery through a partnership approach and a competitive dialogue procurement process, support will be required in the areas of legal and procurement.

Advice will also be taken, as appropriate and required, on any legislative and state aid implications which may arise.

4.3 Environmental Impact

The project will require to implement new physical infrastructure. Contractors will be required to minimise environmental impact during the implementation phase. Following the input of new physical infrastructure, there is not anticipated to be any negative environmental impact.

4.4 Risk Impact

A risk assessment of the proposal was undertaken as part of the Outline Business Case. The key risks and associated mitigating actions, detailed within Appendix 1, are summarised as follows:

- Funding – There is a risk that the cost and funding estimates are too low.
- Supplier Capability– There is a risk that external suppliers may not have the ability to deliver the whole vision
- Legislation change – There could be changing obligations for broadband provision
- Costs / benefits – There is a risk that the assumptions may not be fully realised

- Lack of buy in by services to utilising the network partner
- Misalignment with current and future programmes of work (Enterprise Contract, R100, Other Programmes)
- State Aid – There is a risk that free connectivity might not be legally possible within some areas of North Lanarkshire

5. Measures of success

- 5.1 The main measure of success will be the implementation of a world-class digital infrastructure for North Lanarkshire. In line with the outcomes identified above, systems will be put in place to measure the impact of the digital infrastructure and the supporting programmes put in place to maximise its direct benefits and wider outcomes.

6. Supporting documents

- 6.1 The Digital Economy and Place Ambition Report, Digital and IT Strategy and Outline Business Case for the Network Infrastructure are all available on request.

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Outline Business Case – Risk Assessment Summary

Appendix 1

Risks Identified within the Outline Business Case	Suggested Mitigation within Outline Business Case
<ul style="list-style-type: none"> • Funding – There is a risk that the cost and funding estimates are too low 	<ul style="list-style-type: none"> • Complete market validation of cost estimates before finalising and allocating a programme budget
<ul style="list-style-type: none"> • Supplier Capability– There is a risk that external suppliers may not have the ability to deliver the whole vision 	<ul style="list-style-type: none"> • Establish clear requirements as part of the procurement process so that potential suppliers can assess the feasibility with confidence
<ul style="list-style-type: none"> • Legislation change – There could be changing obligations for broadband provision 	<ul style="list-style-type: none"> • Monitor legislative changes to understand and mitigate any future risk to the chosen model and delivery mechanism
<ul style="list-style-type: none"> • Costs / benefits – There is a risk that the assumptions may not be fully realised 	<ul style="list-style-type: none"> • Take a prudent approach to benefits management • Maintain single post tracker within programme • Implement robust change request process • Embed transformation targets in corporate objectives
<ul style="list-style-type: none"> • Lack of buy in by services to utilising the network partner 	<ul style="list-style-type: none"> • Establish leadership commitment at outset so connectivity services procured are consumed across the council and no shadow procurement takes place • Implement comprehensive engagement and communication plan
<ul style="list-style-type: none"> • Misalignment with current and future programmes of work (Enterprise Contract, R100, Other Programmes) 	<ul style="list-style-type: none"> • Align with the Plan for North Lanarkshire and associated Programme of Works and strategies • Establish one programme plan – mapping dependencies • Make use of programme board to communicate plan and get services on-board the connectivity roll-outs
<ul style="list-style-type: none"> • State Aid – There is a risk that free connectivity might not be legally possible within some areas of North Lanarkshire 	<ul style="list-style-type: none"> • Consult with NLC's legal advisors to establish the level of connectivity that can be delivered for free in different areas, without qualifying as a State Aid